

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

IN RE: Donal Martin McDonagh
And Michele Rawls McDonagh Case No. 12-27642-K
Debtors. Chapter 13

MOTION TO AMEND PLAN

COME NOW Donal and Michele McDonagh (the “Debtors”) and hereby move this Court for leave to amend their repayment Plan (the “Plan”). In support of this motion the Debtors would show the Court as follows:

1. Debtors commenced this proceeding by filing a petition under Chapter 13 of the Bankruptcy Code on July 20, 2012 and filed a repayment Plan on even date.
 2. Debtors' plan was confirmed September 28, 2012.
 3. Debtors' confirmed plan provides for Shelby County Trustee in the amount of \$4,325.60. This was intended by the Debtors to be for the City of Germantown property taxes.
 4. City of Germantown, Tennessee has filed Proof of Claim No. 30 in the amount of \$8,566.36 for the property taxes owed to City of Germantown.

WHEREFORE, the Debtors pray as follows:

1. That City of Germantown, Tennessee in the amount of \$8,566.36 be substituted for Shelby County Trustee in the amount of \$4,325.60, and paid at 12% interest, as a secured creditor, with a monthly payment as determined by the Trustee to pay the claim in full over the life of the plan.
 2. For such other and further relief, both general and specific, to which the Debtors may be entitled and as would be just under the circumstances

Respectfully Submitted,

GENTRY, ARNOLD & MITCHELL, PLLC

/s/ J.D. Gentry

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Motion to Amend Plan has been served electronically, through the Court's electronic noticing system to all parties indicated on the electronic filing receipt, on April 7, 2014 or by U.S. Mail, first-class postage prepaid, on April 8, 2014 to the Debtors and to all other parties requiring written notice.

Debtors

Chapter 13 Trustee, George W. Stevenson
5350 Poplar Ave, Ste 500
Memphis, TN 38119

David J. Harris
130 North Court Avenue
Memphis, TN 38103
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Shelby County Trustee
P.O. Box 2751
Memphis TN 38101

/s/ Katherine Hill

Katherine Hill, Paralegal